

PAUL J. ANDRE (State Bar No. 196585)  
[pandre@kramerlevin.com](mailto:pandre@kramerlevin.com)  
LISA KOBIALKA (State Bar No. 191404)  
[lkobialka@kramerlevin.com](mailto:lkobialka@kramerlevin.com)  
JAMES HANNAH (State Bar No. 237978)  
[jhannah@kramerlevin.com](mailto:jhannah@kramerlevin.com)  
HANNAH LEE (State Bar No. 253197)  
[hlee@kramerlevin.com](mailto:hlee@kramerlevin.com)  
KRAMER LEVIN NAFTALIS  
& FRANKEL LLP  
990 Marsh Road  
Menlo Park, CA 94025  
Telephone: (650) 752-1700  
Facsimile: (650) 752-1800

*Counsel for Plaintiff*  
FINJAN, INC.

JENNIFER A KASH (Bar No. 203679)  
[jenniferkash@quinnemanuel.com](mailto:jenniferkash@quinnemanuel.com)  
SEAN PAK (Bar No. 219032)  
[seanpak@quinnemanuel.com](mailto:seanpak@quinnemanuel.com)  
IMAN LORDGOOEI (Bar No. 251320)  
[imanlordgooei@quinnemanuel.com](mailto:imanlordgooei@quinnemanuel.com)  
SAM STAKE (Bar No. 257916)  
[samstake@quinnemanuel.com](mailto:samstake@quinnemanuel.com)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111-4788  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

*Counsel for Defendants*  
PROOFPOINT, INC. and ARMORIZE  
TECHNOLOGIES, INC.

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

FINJAN, INC.,

Plaintiff,

v.

PROOFPOINT, INC. and ARMORIZE  
TECHNOLOGIES, INC.,

Defendants.

Case No.: 13-CV-05808-HSG

**STIPULATION AND ORDER  
REGARDING PRETRIAL CONFERENCE  
AND PRETRIAL DEADLINES**

Trial Date: June 13, 2016

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Finjan, Inc. and Defendants Proofpoint, Inc. and Armorize Technologies, Inc. (collectively, "the Parties"), by and through their respective counsel, have met and conferred in an effort to agree upon a modified schedule for pre-trial deadlines. In conjunction with this modified schedule, the Parties respectfully request the Court move the Pretrial Conference from May 10, 2016 to May 24, 2016 and extend the pretrial deadlines set forth below. The Parties stipulate as follows:

WHEREAS, the trial in this matter is currently scheduled for June 13, 2016;

WHEREAS, the Pretrial Conference is currently scheduled for May 10, 2016;

WHEREAS the hearing for motions on summary judgment is currently scheduled for March 31, 2016;

WHEREAS, the parties have made substantial effort to work together in good faith to stipulate to extending existing pre-trial deadlines without altering the existing trial date in order to potentially narrow the issues in dispute and streamline their *Daubert*, motions in limine, and pre-trial submissions to the Court;

WHEREAS, the Parties respectfully request the Court re-schedule the following pre-trial deadlines:

| Original Deadline | Stipulated Proposed New Deadline | Event  |
|-------------------|----------------------------------|--|
| April 5, 2016     | April 15, 2016                   | Opening <i>Daubert</i> Motions due   |
| April 19, 2016    | April 28, 2016                   | Motions <i>in limine</i> due   |
| April 19, 2016    | May 3, 2016                      | Oppositions to <i>Daubert</i> Motions  |
| April 26, 2016    | May 5, 2016                      | Oppositions to motions in limine due   |
| April 26, 2016    | May 10, 2016                     | Reply <i>Daubert</i> Motions and Joint pretrial statement and proposed order, proposed jury instructions, proposed voir dire questions, witness list, proposed verdict forms, proposed statement of the case, and trial briefs due |
| April 27, 2016    | May 11, 2016 by noon             | Courtesy copy of binders of pretrial filings due   |
| May 10, 2016      | May 24, 2016                     | Pretrial Conference and <i>Daubert</i> , motions <i>in limine</i> , hearing  |

NOW THEREFORE, the Parties hereby stipulate to and respectfully request (1) the Pretrial Conference be rescheduled for May 24, 2016; (2) pretrial submissions deadlines be set as stipulated

1 and proposed in the table above.

2 **IT IS SO STIPULATED.**

3  
4 Respectfully submitted,

5 Dated: March 24, 2016

By: /s/ Hannah Lee

6 Paul J. Andre (SBN 196585)  
7 Lisa Kobialka (SBN 191404)  
8 James Hannah (SBN 237978)  
9 Hannah Lee (SBN 253197)  
10 KRAMER LEVIN NAFTALIS  
11 & FRANKEL LLP  
12 990 Marsh Road  
13 Menlo Park, CA 94025  
14 Telephone: (650) 752-1700  
15 Facsimile: (650) 752-1800  
16 pandre@kramerlevin.com  
17 lkobialka@kramerlevin.com  
18 jhannah@kramerlevin.com  
19 hlee@kramerlevin.com  
20 *Counsel for Plaintiff*  
21 FINJAN, INC.

22 Respectfully submitted,

23 Dated: March 24, 2016

By: /s/ Jennifer Kash

24 Jennifer A Kash (Bar No. 203679)  
25 Sean Pak (Bar No. 219032)  
26 Iman Lordgooei (Bar No. 251320)  
27 Sam Stake (Bar No. 257916)  
28 QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111-4788  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700  
jenniferkash@quinnemanuel.com  
seanpak@quinnemanuel.com  
imanlordgooei@quinnemanuel.com  
samstake@quinnemanuel.com  
*Counsel for Defendants*  
PROOFPOINT, INC. and ARMORIZE  
TECHNOLOGIES, INC.

**ATTESTATION PURSUANT TO L.R. 5-1(I)**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

/s/ Peter Klivans

Peter Klivans

**ORDER**


**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

(1) The Pretrial Conference shall be on May 24, 2016;

(2) The Parties shall carry out pretrial submissions as set forth in the March 24, 2016

Stipulation Regarding Pretrial Conference and Pretrial Deadlines.

DATED: March 25, 2016

  
The Honorable Haywood S. Gilliam, Jr.  
United States District Judge